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**From:** Chalfant, Mark [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8C1D644333F94EA2AFF756BE6469E5AD-CHALFANT, MARK]  
**Sent:** 10/25/2018 2:11:37 PM  
**To:** Otis, Andrew [Andrew.Otis@lockelord.com]  
**Subject:** RE: Anaconda/CFAC--RI/FS Schedule Modification  
**Attachments:** AOC Mod-RIFS Work Plan Schedule\_2017.11.28\_Draft.docx

Andrew,

No worries. Here's what I believe is the final Word version of the AOC amendment. For future cases, it may be more efficient to enter into an AOC which gives the EPA Remedial Project Manager the discretion to modify the workplan schedule at the request of the AOC respondent. This would eliminate the need to prepare and file a formal AOC amendment. We have the flexibility to negotiate either type of arrangement with a potentially responsible party. Thanks for preparing the amendment.

Mark

**Mark A.R. Chalfant**

Senior Enforcement Attorney | Office of Enforcement, Compliance and Environmental Justice | U.S. EPA Region 8  
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**From:** Otis, Andrew [mailto:Andrew.Otis@lockelord.com]  
**Sent:** Thursday, October 25, 2018 8:04 AM  
**To:** Chalfant, Mark <Chalfant.Mark@epa.gov>  
**Subject:** RE: Anaconda/CFAC--RI/FS Schedule Modification

Mark,

Thanks for the reminder. Understood. If you send me word copy of the AOC First Amendment I will draft and send for your review.

Best regards,

Andrew

Andrew Otis  
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**From:** Chalfant, Mark [mailto:Chalfant.Mark@epa.gov]  
**Sent:** Thursday, October 25, 2018 9:59 AM  
**To:** Otis, Andrew  
**Subject:** Anaconda/CFAC--RI/FS Schedule Modification

Andrew:

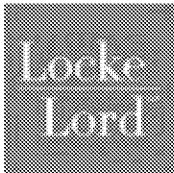
Thanks for your VM msg. yesterday. Mike Cirian has informed me that he and Mr. Stroiazzo have tentatively agreed to an RI/FS schedule modification. As you may recall, in 2017, we modified the RI/FS schedule appended to the 2015 AOC. We will need to follow the same process this time, which entails preparing a formal amendment to the AOC and having the Assistant Regional Administrator and the Program Director sign off on the schedule modification. Attached are the documents we used in 2017. I just need to confirm with Andrea Madigan that the CERCLA delegations have not changed since 2017. Happy to discuss by phone.

Thanks,  
Mark

**Mark A.R. Chalfant**

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